

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE:	:	
	:	
CHARLENE M. BAUGH,	:	CASE NO. 13-41992-PWB
Debtor,	:	
-----	:	
CHARLENE M. BAUGH,	:	
Plaintive,	:	
v.	:	ADVERSARY NO. 13-4035
MAJOR MOTORS, INC,	:	
Defendant,	:	

ANSWER TO COMPLAINT

COMES NOW MAJOR MOTORS, INC, (hereinafter referred to as Defendant (set forth as “Respondent” in Plaintiff’s Complaint), and respectfully shows the Court the following:

1.

Paragraph one does not appear to require a response from Defendant.

2.

The Plaintiff can neither admit or deny the allegation in paragraph 2.

3.

The Plaintiff denies the allegation in paragraph 3.

4.

The Plaintiff can neither admit or deny the allegation in paragraph 4.

5.

The Plaintiff denies the allegation in paragraph 5.

6.

The Plaintiff can neither admit or deny the allegation in paragraph 6.

7.

The Plaintiff denies the allegation in paragraph 7.

8.

The Plaintiff admits the allegation in paragraph 8.

9.

The Plaintiff denies the allegation in paragraph 9.

10.

The Plaintiff denies the allegation in paragraph 10.

WHEREFORE, Plaintiff prays that this Honorable court Deny the relief sought in the complaint, and for whatever other relief the Court deems proper.

Respectfully submitted,

/s/ David Sicay-Perrow
David Sicay-Perrow, GA Bar Number 645285
Sicay-Perrow Knighten, , P.C.
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Atlanta, GA 30301
(404) 589-1832
(404) 589-1833 (facsimile)
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the following parties with a copy of the within Answer to Complaint by placing a copy of the same in the U.S. Mail with adequate first class postage affixed and addressed to:

Mary Ida Townson
Chapter 13 Trustee
Suite 2200
191 Peachtree Street
Atlanta, GA 30303

Charlene Mildred Baugh
10 Carriage Hill Drive
Cartersville, GA 30120

This 9th day of September, 2013.

/s/ _____ David Sicay-Perrow _____
David Sicay-Perrow, GA Bar Number 645285